

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHEVRON CORPORATION, :  
: :  
Plaintiff, : :  
: : 11 Civ. 0691 (LAK)  
v. : :  
: :  
STEVEN DONZIGER, *et al.*, :  
: :  
Defendants. : :  
: :  
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**NOTICE OF CHEVRON CORPORATION'S  
MOTION FOR ENTRY OF DEFAULT JUDGMENT**

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Chevron Corporation's ("Chevron") Motion for Default Judgment, dated April 6, 2018; the Declaration of Randy M. Mastro, dated April 6, 2018; and all prior pleadings and proceedings in this matter, Chevron respectfully moves this Court for entry of a default judgment against all Defendants who have defaulted in this case,<sup>1</sup> pursuant to Federal Rule of Civil Procedure 55(b)(2) and Local

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<sup>1</sup> The following Defendants have defaulted: Pablo Fajardo Mendoza, Luis Yanza, Frente de Defensa de la Amazonia, Selva Viva Selviva Cia, Ltda, Maria Aguinda Salazar, Carlos Grefa Huatatoca, Catalina Antonia Aguinda Salazar, Lidia Alexandra Aguinda, Patricio Alberto Chimbo Yumbo, Clide Ramiro Aguinda, Luis Armando Chimbo Yumbo, Beatriz Mercedes Grefa Tanguila, Lucio Enrique Grefa Tanguila, Patricio Wilson Aguinda Aguinda, Celia Irene Viveros Cusangua, Francisco Matias Alvarado Yumbo, Francisco Alvarado Yumbo, Olga Gloria Grefa Cerdá, Lorenzo Jose Alvarado Yumbo, Narcisa Aida Tanguila Narvaez, Bertha Antonia Yumbo Tanguila, Gloria Lucrecia Tanguila Grefa, Francisco Victor Tanguilla Grefa, Rosa Teresa Chimbo Tanguila, Jose Gabriel Revelo Liore, Maria Clelia Reascos Revelo, Maria Magdalena Rodriguez Barcenes, Jose Miguel Ipiales Chicaiza, Heleodoro Pataron Guaraca, Luisa Delia Tanguila Narvaez, Lourdes Beatriz Chimbo Tanguila, Maria Hortencia Viveros Cusangua, Segundo Angel Amanta Milan, Octavio Ismael Cordova Huanca, Elias Roberto Piyahuaje Payahuaje, Daniel Carlos Lusitande Yaiguaje, Benancio Fredy Chimbo Grefa, Guillermo Vicente Payaguaje Lusitante, Delfin Leonidas Payaguaje Payaguaje, Alfredo Donaldo Payaguaje Payaguaje, Teodoro Gonzalo Piaguaje Payaguaje,

Civil Rule 55.2(b) of the Local Rules of the United States District Court for the Southern District of New York. Chevron requests an award of equitable relief as set forth in the attached Proposed Order of Default Judgment, and further requests such other relief as the Court deems just and proper.

Dated: April 6, 2018

New York, New York

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

*s/ Randy M. Mastro*

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